

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 13 - _____
v.	:	DATE FILED: _____
VENUS JENKINS	:	VIOLATION:
	:	18 U.S.C. § 641 (conversion of government funds – 1 count)

INFORMATION

COUNT ONE

(Conversion of Government Funds)

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Defendant VENUS JENKINS was employed by the United States Postal Service (“USPS”), an agency of the United States, as a sales and service associate (“SSA”) at the Norristown Post Office in Norristown, Pennsylvania.
2. The Norristown Post Office served the general public through, among other services, issuing refunds to customers for unused meter postage and for services not rendered. Refunds issued to customers in amounts up to \$25.00 were paid out in cash. Refunds in amounts greater than \$25.00 were paid via USPS no-fee money orders.
3. Each time a refund was given, the SSA was required to have the customer complete a USPS Form 3533 in order to verify the customer’s claim and to verify that the refund was paid to the customer by the SSA.

4. From on or about June 2, 2010, through on or about December 7, 2011, defendant VENUS JENKINS transacted approximately 219 fictitious and fraudulent refunds.

5. Defendant VENUS JENKINS would indicate on her cash register that she had given a customer a refund for either unused meter postage or for services not rendered when no customer was present nor had been given a refund. Defendant JENKINS would then take the USPS funds that had allegedly been refunded to a customer and keep them for herself. In order to facilitate the scheme, the supporting USPS Form 3553's were either forged or photocopied and fraudulently altered by defendant JENKINS.

6. As a result of her scheme, defendant VENUS JENKINS stole approximately \$17,011.24 from the USPS.

7. From on or about June 2, 2010 through on or about December 7, 2011, in the Eastern District of Pennsylvania, defendant

VENUS JENKINS

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$17,011.24 in USPS funds, which she was not entitled to receive.

In violation of Title 18, United States Code, Section 641.


ZANE DAVID MEMEGER
United States Attorney